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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

10 UNITED STATES OF AMERICA,

No. 24-CR-568-EKL

11 Plaintiff,

STIPULATION AND [PROPOSED] ORDER
12 v. TO CONTINUE CHANGE-OF-PLEA
13 JACINTO CORREA CRUZ,
14 HEARING
15 Defendant.

16 Defendant Jacinto Correa Cruz and the Government, by and through their respective
17 counsel, stipulate and agree, with the Court's approval, that change-of-plea currently set for
18 December 10, 2024 at 10:30 a.m. may be continued to December 17, 2024 at 10:30 a.m. The
19 reason for the requested continuance is so that defense counsel can meet and confer with her
20 client about the plea agreement and so that the parties can continue to confer about the case.

21 The parties also stipulate and agree that excluding time to December 17, 2024, will allow
22 for effective preparation of counsel. 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate
23 and agree that the ends of justice served by excluding the time from December 10, 2024 to
24 December 17, 2024, outweigh the best interests of the public and the defendant in a speedy trial.

25 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(iv).

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STIPULATION AND [PROPOSED] ORDER
24-CR-568-EKL

1 IT IS SO STIPULATED.
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Dated: December 5, 2024

4 _____/s/
5 Tamara Crepet
6 Counsel for Defendant

Dated: December 5, 2024

7 ISMAIL J. RAMSEY
8 United States Attorney
9 _____/s/
Anne Hsieh
Assistant United States Attorney

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11 **[PROPOSED] ORDER**

12 Upon agreement and stipulation of the defendant, and the United States, and their
13 respective counsel, and good cause appearing, IT IS HEREBY ORDERED that defendant
14 Correa Cruz's change-of-plea hearing set for December 10, 2024 at 10:30 a.m. be continued to
15 December 17, 2024 at 10:30 a.m.

16 It is also ORDERED that time may be excluded to December 17, 2024, to allow for the
17 effective preparation of counsel. The Court finds that failing to exclude time to December 17,
18 2024 would unreasonably deny counsel the reasonable time necessary for effective preparation,
19 taking into account the exercise of due diligence. *See* 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(iv).

20 The Court further finds that the ends of justice served by excluding the time between
21 December 10, 2024 and December 17, 2024, outweigh the interests of the public and the
22 defendant in a speedy trial. 18 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(iv).

23 IT IS SO ORDERED.
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DATED: 12/6/2024


25 HONORABLE EUMI K. LEE
26 United States District Judge
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